

DEC 04 1998

Via Facsimile

Regular Mail

Mr. Gwen B. Zervis, P.E.
Case Manager
Bureau of Federal Case Management
New Jersey Department of Environmental Protection
401 East State Street
Trenton, New Jersey 08625

RE: L.E. Carpenter Superfund Site, Wharton, New Jersey
EPA Comments on the *Workplan To Implement Further
Investigative and Remedial Action*, dated November, 1998

Dear Ms. Zervis:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document and has the following comments:

MW-19/Hot Spot 1

Monitoring Well Installation

Complete delineation of the organic contaminant plume is the objective of the proposed investigation, however, this may not be possible with the three monitoring wells as proposed. Therefore, the work plan should outline a prior groundwater screening investigation, in the nature of geoprobe, hydro punch, or other similar methodology, in the down gradient area before the installation of permanent monitoring wells. The screening, if conducted properly, would provide valuable information necessary to ensure complete delineation of the organic plume, and could reduce or eliminate the need for locating additional monitoring wells in the near future. In addition, the down gradient area being considered may require four wells (as opposed to 3), therefore it is recommended that a fourth well be proposed, subject to installation based on the results of the prior screening investigation.

Hot Spots B and C

Page 3-3, Section 3.2.1 Hot Spot B and C - Delineation and Characterization:

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The work plan states that 10 samples will be submitted for lead analysis for each of the two hot spot areas, for a total of 20 samples. The notion that "field observations" will be used to select samples for lead analysis is vague and not a useful screening methodology. As any one of a number of field screening methodologies are available, some of which are more suitable than others, the methodology must be clearly outlined in the work plan and subsequently approved prior to the conduct of field work. In addition, the work plan should specify the number of proposed sampling locations, subject to change based on the field screening results, as well as include a figure(s) of the proposed locations at a useful scale.

If you have any questions or comments on the above, please contact me at (212) 637-4411. In addition, please note that I appear to be receiving L. E. Carpenter work plans and updates on a regular basis. Thank you for the opportunity to review the above work plan.

Yours truly,

Stephen Cipot, Remedial Project Manager
Southern New Jersey Remediation Section

bcc: Dean Maraldo, PSB
Kim O'Connell, SNJRS
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